

# Federal Defenders OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director  
and Attorney-in-Chief

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

April 14, 2023

**BY ECF**

Hon. Victor Marrero  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 4/14/2023

**Re: United States v. Pablo Armando Valenzuela and Aaron Miller**  
**22-Cr-633**

Dear Judge Marrero:

I represent defendant Pablo Armando Valenzuela in the above-captioned case. I write to request an adjournment of the motion deadlines and status conference currently scheduled in this matter.

The Government initially produced discovery to counsel for Mr. Valenzuela and Mr. Miller on February 3, 2023. An additional discovery production was made on March 28, 2023. The parties continue to review that discovery, and are actively working toward a possible disposition in this matter. Given the ongoing discovery review and plea negotiations, I write to request an adjournment of the upcoming motion deadlines and status conference as follows:

- Defense Status Letter Regarding Anticipated Motions: May 22, 2023 (currently due April 21, 2023)
- Defense Motions Due: June 16, 2023 (currently due May 15, 2023)
- Government Responses Due: June 30, 2023 (currently due May 29, 2023)
- Defense Replies Due: July 7, 2023 (currently due June 5, 2023)
- Status Conference: July 14, 2023 (currently scheduled for June 9, 2023)

I have consulted with co-defendant Aaron Miller's counsel, Stephen Turano, and he joins in this request. I have also consulted with the government, which has no objection.

The defense consents to the exclusion of time under 18 U.S.C. § 3161(h)(7)(a), as this additional period of time is necessary for discovery review and motion preparation.

**Request GRANTED.** The Court adjourns the above motion deadlines per the above and adjourns the status conference until July 14, 2023, at 10:00 AM. The Court also hereby orders the exclusion of time until July 14 for the purposes of speedy trial.

**SO ORDERED.**

4/14/2023

DATE

  
VICTOR MARRERO, U.S.D.J.

Sincerely,  
/s/

Michael Arthus  
Assistant Federal Defender  
212-417-8760